

March 23, 2010

Jeff S. Jordan  
Supervisory Attorney,  
Complaints Examination & Legal Administration  
Federal Elections Commission  
Washington, D.C. 20463

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FEDERAL ELECTION  
COMMISSION  
2010 MAR 24 AM 8:05  
OFFICE OF GENERAL  
COUNSEL

Dear Mr. Jordan:

**Re: MUR6258- LIBERATORE FOR CONGRESS COMMITTEE**

Pursuant to your letter of March 8, 2010, the Liberatore for Congress Committee hereby responds to the complaint dated March 3, 2010.

We acknowledge that the filing of our Form 1 exceeded the required time mandate of 11 CFR § 102.1(a). (Ten days after the filing of Form 2 - December 20, 2010.) We regret this deficiency and submit ourselves to the judgment of the Federal Elections Commission to either dismiss the matter, or in the alternative, submit the matter to prejudgment conciliation.

Our error, while a de jure violation of the Code of Federal Regulations, fails to rise to a level requiring further scrutiny by the Commission for the following reason of extenuation:

Under the intent of the Federal Election Act of 1971 "the Act," the Liberatore for Congress Committee fulfilled its obligation to openness and transparency well before its required timing. As the complaint describes in Paragraph 11 "Relevant Law," a candidate must file Form 2 within 15 days of campaign activity exceeding a \$5,000 threshold. As future campaign disclosures will reveal, the Liberatore for Congress Committee did not exceed the \$5,000 threshold until January 20, 2010. Therefore Form 2 was not required to be filed until February 4, 2010. Form 1 would then not be required to be filed before February 14, 2010. The filings made December 10, 2009 and January 15, 2010 were made well in advance of that required timing; thereby consistent with the intent of the "Act". Therefore, the error in the timing of submission of Form 1 was only a de minimis violation of the 11 CFR § 102.1(a).

Due to the over eagerness of the candidate to comply with the law, and to run for office, the filing was made seven weeks prematurely- four weeks prior to my retention as the Committee's Treasurer. After I assumed the duties of Treasurer, I filed the required Form 1 as soon as practicable.

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Jeff S. Jordan, FEC  
Liberatore for Congress Committee  
March 23, 2010  
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We apologize to the Federal Elections Commission for this oversight and will endeavor to ensure that future filings continue to fulfill the intent of the Act, meet the mandated deadlines and are consistent with the requirements of the law.

The forgoing is correct and accurate to the best of my knowledge, information and understanding.

Respectfully submitted,



Louis G. Baglietto, Jr.  
Liberatore for Congress Committee

Cc: Frankie D. Hampton via email: \_\_\_\_\_

Sworn to and subscribed before me this 23<sup>rd</sup> day of March, 2010.



N.C. Leachirukona  
Notary Public

My Commission Expires: April 16, 2013

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